

February 9, 2021

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 2/11/2021

**VIA ECF**

Honorable Victor Marrero  
U.S. District Court  
Southern District of New York  
500 Pearl Street, Suite 1610  
New York, NY 10007

Re: *In re European Government Bonds Antitrust Litigation*  
No. 19-cv-02601-VM (S.D.N.Y.)

Dear Judge Marrero:

We write on behalf of Plaintiffs in the above-referenced action. In accordance with Rule II.H of Your Honor's Individual Practices, we respectfully request leave to file under seal Plaintiffs' Fourth Amended Consolidated Class Action Complaint ("FAC"). The FAC cites and discusses chatroom transcripts that have been designated by a cooperating bank ("Cooperating Bank") as Highly Confidential under the terms of a Confidentiality Agreement between Plaintiffs and the Cooperating Bank. Consistent with the Court's rules, Plaintiffs submit herewith a copy of the proposed redacted filing.

The Cooperating Bank asserts that the redacted portions of the FAC are entitled to confidentiality because they contain non-public, confidential, proprietary, commercial, and/or customer information. In addition, the Cooperating Bank asserts that under English law, there is a general common law duty of confidentiality owed to clients.

We are available at the Court's convenience to discuss these matters should the Court so desire.

Respectfully submitted,

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Defendants in the above-referenced matter are hereby directed to respond, by joint letter, to Plaintiffs' request to file the FAC under seal (Dkt. No. 144) setting forth their position with respect to the request.

**SO ORDERED.**

2/11/2021

DATE

  
VICTOR MARRERO, U.S.D.J.

cc: All counsel of record (vi